

Microsoft Privacy Development Standard

JC Cannon
Privacy Strategist
Corporate Privacy Group
Microsoft Corporation

Agenda

- Problem we are trying to solve
- Background of proposed solution
- How privacy development standard fits into organization
- How TCAAB can help in creation / deployment of standard

Before the Standard

- Other than Windows and Office, many product groups were building components without a privacy review
- Privacy reviews were done without regard to corporate privacy policy
- There was no consistency in how privacy reviews were performed
- No formal signoff

Purpose of the Standard

- Fulfill Microsoft's desire to build privacy-aware applications & services
- Consolidate standards and guidelines created by other product groups
- Fill void for privacy direction in product groups – once deployed

MS Privacy Development Standard

The Roadmap

Creation -----

CPG/
PG Leads

Validation --

PMC

TCAAB

Execs

Adoption -----

DMD

MSN

Office

Windows

MS Privacy Development Standard Document Creation

- Derived from corporate privacy policy
- Operationalizes PD3 philosophy
- Includes privacy work from Windows, Office, MSN, and MS.com teams
- Embraces Safe Harbor Principles

MS Privacy Development Standard

Document organization – Basic concepts

- Data classifications
 - Anonymous, PII, Sensitive PII
- Types of notice and consent
- Types of privacy controls
 - User, administrator, parental
- Data minimization
- Exception processing

MS Privacy Development Standard

Document organization – The analysis

- Basic Privacy Analysis
 - Determine if data is being processed
 - Provide disclosure
- Detailed Analysis
 - Determine component type
 - Client, service, server
 - Select type of dataflow component uses
 - Follow rules for dataflow type

Performing an Analysis

Basic Analysis



Detailed Analysis

Select component type

Client Component

Server Component

Service Component

Select dataflow type

- A. Collection of data from the user
- B. Transfer of data to data store
- C. Transfer of data to a Microsoft site
- D. Transfer of data to third-party sites
- E. Transfer of data to another component
- F. Transfer of data to an external server
- G. Transfer of data to a peer machine
- H. Transfer of data from another component
- I. Storage of sensitive data in persistent

Active Directory (AD) Group Policy

You chose to end the installation program. Active Directory (AD) Group Policy.

The program is not responding.

Please tell Microsoft about this problem.

On the next screen, you will be asked to provide details about the problem. Active Directory (AD) Group Policy. We will use the information you provide to help us improve our products.

For more information, see the Microsoft website: www.microsoft.com

Click Close

Click Close



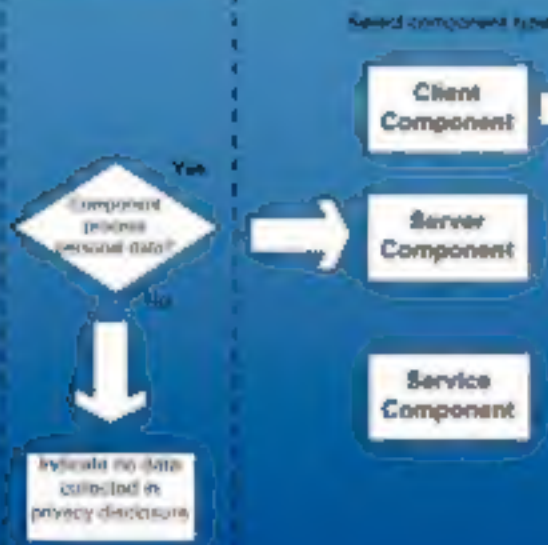
Portable media storage



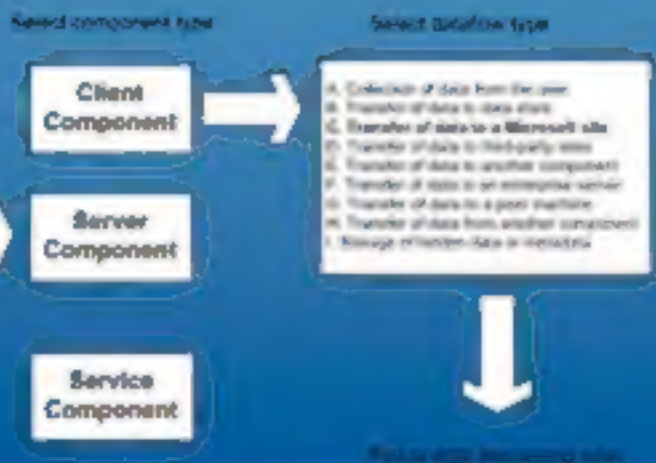
Click to expand

Performing an Analysis

Basic Analysis



Detailed Analysis



6.2 Features that transfer data from the user's computer
WHIST provides a program feature to alert about the Malware being transferred across the data transmission.

WHIST provides automatic generation and is designed for transfer of the data. Whistler's program transfer data to Whistler's data storage system. Whistler's program transfer data to Whistler's data storage system. Whistler's program transfer data to Whistler's data storage system.

6.3 Features that transfer data from the user's computer

WHIST provides a program feature to alert about the Malware being transferred across the data transmission. WHIST provides automatic generation and is designed for transfer of the data. Whistler's program transfer data to Whistler's data storage system. Whistler's program transfer data to Whistler's data storage system.

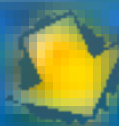
WHIST provides a program feature to alert about the Malware being transferred across the data transmission. WHIST provides automatic generation and is designed for transfer of the data. Whistler's program transfer data to Whistler's data storage system. Whistler's program transfer data to Whistler's data storage system.

MS PR / Development Standard Status and Next Steps

8/1/15 / Handled



8/1/15 / Development Standard



Eng Excellence Guide

SDLC

Product Groups



CheckPoint Express

Engineering Excellence Guide

The screenshot shows a web browser window with the address bar displaying "http://www.microsoft.com/learning/en/eng-excel". The page title is "Planning for trustworthy computing". The left sidebar contains a "Product cycle phase" menu with options: "Planning", "Design", "Implementation", "Deployment", "Release", "As needed", "About this site", "FAQ", and "Glossary". The main content area has a heading "Planning for trustworthy computing" and a sub-heading "Select a description program model". The text on the page discusses the importance of trustworthy computing in today's world, where data is an important asset. It mentions that Microsoft is committed to helping customers build trustworthy computing solutions. The page also includes a section titled "Stay current with worldwide trustworthy computing issues" and a link to "Follow guidelines for contests, free of charge".

Planning for trustworthy computing

Select a description program model

Planning for trustworthy computing

The trustworthiness of computing solutions is an important factor in today's world. Microsoft is committed to helping customers build trustworthy computing solutions.

Stay current with worldwide trustworthy computing issues

Follow guidelines for contests, free of charge

Checkpoint Express



CheckPoint Express

Privacy Requirements

CheckPoint Express

EN GB SPN Français 中文 日本語

✓ CheckPoint express

Powered by CheckPoint

Home | Add your details | Register your product | Contact us | Help | More

Currently logged out as IT Customer

Group/Title

1 of 1 in 1

12 of 12

Privacy

11 of 11

11 of 11

The following information is provided to you as a statement of our policy on the collection, use and disclosure of your personal data.

- This privacy policy is part of our terms and conditions of sale and is subject to our terms and conditions of sale.
- This policy is subject to our terms and conditions of sale and is subject to our terms and conditions of sale.
- This policy is subject to our terms and conditions of sale and is subject to our terms and conditions of sale.

Transfers of any data by the product to Microsoft are only done with a press and user consent.

- This is applicable whether or not the data contain personally identifiable information or not.
- For further information on the rules for transferring data to Microsoft see section 10 of the Privacy Policy.

Transfers of any data by the product to third parties are only done with a press and user consent.

- This is applicable whether or not the data contain personally identifiable information or not.
- For further information on the rules for transferring data to third parties see section 10 of the Privacy Policy.

Extending the Standard

Missing Elements & Challenges

- Integration with Software Dev Life Cycle
- Deployment Process
 - Standalone or integrated
- Add special topics:
 - Privacy for RFID Solutions
 - Location-based services
 - Guidelines for COPPA
 - Dealing with IP addresses
 - Best practices for advertising and configuration changes
 - Retention guidelines
 - SQM / CEIP

Feedback from TCAAB

- The best way to provide feedback is by sending a redline of the standard
- Questions to be answered:
 - IS PD3+C framework optimal?
 - How is the flow of the standard?
 - Does it cover the right topics?
 - What pieces are missing?
 - How do we adapt the standard over time?
 - Should each product group add their nuances or create their own standards?

